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February 1, 1983

Mr. James G. Keppler, Regional Administrator
Directorate of Inspection and Enforcement-
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station, Units 2 and 3
Quad Cities Station Units 1 and 2
Status of Installation of I.E.
Bulletin 79-14 Safe Shutdown
Path Supports NRC Docket Nos.
50-237, 50-249, 50-254, and 50-265

References (a): J.G. Keppler letter to Cordell Reed
dated July 14, 1982 (Confirmation of
Action Letter)

(b): T.J. Rausch letter to J.G. Keppler
dated January 13, 1983

Dear Mr. Keppler:

In accordance with Reference (b), we are sending you an updated installation status report and an assessment of our ability to meet the February 15, 1983 completion date for safe shutdown supports. From our continued assessment of our resources and progress, we have come to the following conclusions.

Safe Shutdown Path (SSP) Clarification

During the Plant Unique Analysis phase of the Mark I program, which is currently being performed, it has been determined that additional modifications are needed on the target rock relief valve lines on Dresden and Quad Cities. These modifications are needed to meet final seismic and Mark I loading requirements. All the lines do, however, meet the operability requirements defined by the 79-14 program.

In the sequence defined for the SSP, the Automatic Depressurization System (ADS) performs the function of reducing reactor pressure to enable the LPCI system to initiate. Of the five ADS relief lines available for blowdown, four have electromatic relief valves and are supported to FSAR requirements. The fifth has a Target Rock relief valve line which meets operability requirements but will require modification to meet FSAR requirements. Therefore, the SSP now includes only those four relief lines which contain the electromatic relief valves which are more than adequate to provide for the pressure relief function.

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The modifications needed to support the Target Rock relief lines to meet FSAR requirements will be completed on Dresden 2 and 3, and Quad Cities 2 by the existing December 1983 order date. The modifications will be completed during the next available refueling outage for Quad Cities Unit 1 which begins in March of 1984.

79-14 Projected Completion

<u>Unit</u>	<u>SSP</u>	<u>Exceptions</u>	<u>All 79-14</u>	<u>Exceptions</u>
QC 1	2/25/83	1-RHR hanger (next 4 day outage)	12/31/83	None
QC 2	2/25/83	None	12/31/83	2-SRV line (3/84)
DR 2	End of Outage (4/83)	None	12/31/83	None
DR 3	4/1/83	2 DGSW and 2-LPCI hangers (12/31/83)	12/31/83	None

Quad Cities will be effectively complete by February 15, 1983 for both units. We estimate that it may take an additional 7 to 10 days to complete approximately 6 to 11 hangers. Dresden Unit 3 is projected to be 84% complete by the committed date. The new projected completion date for Dresden Unit 3 and Unit 2, with the exception of 2 Diesel Generator Service Water (DGSW) hangers and 2 hangers on the Unit 3 LPCI loop, are now scheduled for on or about April 1, 1983. This is the approximate date for the completion of the Unit 2 outage. The ensuing paragraphs provide a status of each station.

Quad Cities

Presently Quad Cities has 109 hangers left to install with a work force of 200 people devoted to the safe shutdown path installation effort. As stated, we will be effectively complete with the exception of one hanger for Unit 1. This hanger is located in an extremely high radiation and high temperature area making installation impossible while the unit is in operation. Therefore this hanger will be installed at the next available 2-4 day outage. There may be an additional 6 to 11 hangers that may require an additional one to two week period to facilitate completion. These hangers are large and complex and are clustered together on the Unit 1 and Unit 2 RHR pump discharge making it impossible to work on all of these hangers at the same time. Therefore all safe shutdown piping systems are expected to be complete by the required date with the exception of the RHR loops which will be complete on or before February 25, 1983 with the exception of one hanger for ALARA concerns. All systems meet operability without these modifications.

As a correction to Reference (b), Quad Cities went to a 9 hour work day as of January 10 and then went to a 10 hour work day as of January 24, 1983. In Reference (b) we mistakenly indicated that Quad Cities went to a ten hour work day as of January 10.

Dresden

Presently, Dresden Unit 2 is in a refueling outage, therefore all SSP hangers will be completed upon Unit restart (April 1983). Dresden Unit 3 has 98 out of 180 hangers completed. By February 15, 1983 we expect to have approximately 150 hangers installed. The balance will be complete on or about April 1, 1983 with the exception of four hangers located in high radiation areas. These will be completed at the next available outage (October 1983). All safe shutdown piping systems for Unit 3 will be complete by February with the exception of the LPCI loop and DGSW hangers. All systems are operable without modification.

It is recognized that the information furnished in Reference (b) indicated that the completion date for Dresden Unit 3 appeared achievable. However, that assessment was based on what is now recognized to be overly optimistic premises.

Hanger Complexity - Original estimates were based upon 79-14 EDS Nuclear's design. The 30 supports affecting the February 15, 1983 commitment are designed by Nutech engineers and provide for loads from both the Mark I (torus attached piping) as well as the 79-14 seismic loads. Those designs were released in December 1982; however, a detailed field review for constructability was just completed. Originally these hangers were estimated at 400 mhrs/hanger. They are now expected to require 1000 mhrs/hanger, more than double the original estimate.

Work Force Saturation - When we indicated in our January 13, 1983 letter that our problem with material availability was not expected to affect schedule we had anticipated increases in manpower and overtime would recover that lost time. Presently Dresden is working two 10 hour shifts with some 390 people devoted to this effort. However, monitoring the output in hangers completed per week, we have now seen a loss of productivity with this size work force. As at Quad Cities Station, many of these hangers physically preclude simultaneous installation. The impact of extra personnel for the outage work has resulted in a total of 600 people on-site which has resulted in a larger than expected management effort.

It should be emphasized that all systems have passed a conservative operability analysis and the remaining installation will provide additional margin to these systems.

February 1, 1983

Summary

Quad Cities will essentially make the commitment within 7-10 days, with the exception of one RHR hanger to be completed with the next outage due to ALARA concerns. All remaining 79-14 hangers will be complete by December 31, 1983 with the exception noted for Mark I.

Dresden will have 84% of SSP hangers complete on the February 15, 1983 date with 100% SSP by April, 1983, excluding four hangers that will slip to the next refueling outage due to ALARA concerns. All remaining 79-14 hangers will be complete by December 31, 1983.

Commonwealth Edison has made a total effort to complete the installation of the safe shutdown path hangers by February 15, 1983. Since July, Quad Cities has installed 312 hangers from a total of 421 safe shutdown hangers and Dresden has installed 256 hangers from a total of 403. The new dates specified herein are, in our judgment, the earliest that completion can be achieved.

As discussed with your staff in recent telecons, Commonwealth Edison personnel are available to meet with you at your convenience for further discussions of this matter.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions you may have concerning this matter to this office.

Very truly yours,

Charles W. Schneider 2/1/83
for Thomas J. Rausch
Nuclear Licensing Administrator

dg/lm

cc: L. Spessard
D. Danielson
NRC Resident Inspector - Dresden
NRC Resident Inspector - Quad Cities